



cause, provided that out-of-state counsel certifies familiarity with the local civil court rules.”  
LCvR 83.3(c).

Defendant’s counsel, Steven L. Rahhal, qualifies for the exception allowed by Local Civil Rule 83.3(c). Mr. Rahhal has been licensed to practice law in the State of Oklahoma since passing the bar in 1987 after graduating from the University of Oklahoma College of Law. He has regularly practiced in the Northern District of Oklahoma without the aid of local counsel since his admission to this Court in May 2007.<sup>1</sup> Mr. Rahhal lived in Oklahoma from 1962 to 1989, and worked as an attorney at the law firm of Crowe & Dunlevy based in Oklahoma City from 1987 to 1989 before relocating his practice to Dallas.

Defendant’s counsel is now with the law firm of Littler Mendelson, P.C. (“Littler”), an international firm that specializes in representing employers in employment-related disputes, such as the instant case. Although defense counsel is located in Dallas, Texas, and Littler does not maintain an office in the State of Oklahoma, Dallas is approximately 258 miles from Tulsa and is only one hour away from Tulsa by plane. Defense counsel would therefore be able to travel to and appear in Tulsa upon short notice if necessary.

In addition, defense counsel’s firm handles a substantial number of Main Event’s employment-related matters, and, therefore, has special and particularized knowledge that will allow defense counsel to handle this matter effectively and efficiently. Moreover, if Defendant is required to retain local counsel, it will unnecessarily increase its costs of defending this suit.

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<sup>1</sup> This Court has previously waived the local counsel requirement for Mr. Rahhal. *See, e.g., Kimberly Borland v. Farwest Corrosion Control Company*, Case No. CIV-17-CV-403-CVE-MJX (N.D. Okla. Aug. 28, 2017) (Dkt. No. 11) (granting relief from local counsel requirement for Mr. Rahhal) (attached hereto as Exhibit 1); *David L. Keneipp v. MVM, Inc.*, Case No. 15-CV-565-JED-TLW (N.D. Okla. Dec. 4, 2015) (Dkt. No. 17) (granting relief from local counsel requirement for Mr. Rahhal) (attached as Exhibit 2); and *Robin E. Craycraft v. Belk, Inc.*, Case No. 4:15-CV-00335-JED-PJC (N.D. Okla. July 22, 2015) (Dkt. No. 10) (granting relief from local counsel requirement for Mr. Rahhal) (attached as Exhibit 3).

Finally, defense counsel certifies that he has read and is familiar with the Local Civil Rules of the United States District Court for the Northern District of Oklahoma.

Given these circumstances, and for good cause shown, Defendant respectfully asks that Steven L. Rahhal be permitted to appear without local counsel.

## **II. Conclusion**

For the reasons set forth herein, Defendant Main Event Entertainment LP d/b/a Main Event Entertainment a foreign limited partnership respectfully requests that the Court enter an Order granting it relief from the local counsel requirement of Local Civil Rule 83.3 and allowing its non-resident counsel Steven L. Rahhal to appear without local counsel.

Dated: February 8, 2018

Respectfully submitted,

/s/ Steven L. Rahhal

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**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of February 2018, I served a copy of this document via First Class Mail and electronically transmitted this document to the Clerk of Court using the CM/ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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/s/ Steven L. Rahhal  
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